

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268

DSCF STANDARD MAIL LOAD LEVELING

Docket No. N2014-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MALONE  
TO PUBLIC REPRESENTATIVE DISCOVERY REQUESTS  
(PR/USPS-T1-22, 23, 24(b), (c), (f), and (g), and 27)  
(January 31, 2014)**

The United States Postal Service files the responses of witness Linda Malone to the above-identified discovery requests of the Public Representative, filed on January 15, 2014. Interrogatories PR/USPS-T1-21, 24(e), 25, 26, 28, and 29 were redirected to the Postal Service for a response. Responses to subparts (a) and (d) of Interrogatory PR/USPS-T1-24 are forthcoming. The discovery requests are stated verbatim and followed by the response.

Respectfully submitted,

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## **RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MALONE TO PUBLIC REPRESENTATIVE DISCOVERY REQUEST**

### **PR/USPS-T1-22**

In Docket No N2012-1, the Postal Service analyzed the capacity of the mail processing network and potential future designs using a variety of analytical methods. Specifically, the Postal Service focused on two aspects of capacity and design: (1) the workload required to process volumes in the context of the current and proposed service standards and (2) the operating windows required to meet those service standards. The Postal Service showed that as service standards are reduced, operating windows can be increased. The increase in operating flexibility associated with reduced service decreased the amount of processing equipment and physical capacity required for the network to process the mail.

a. Will the Load Leveling Plan increase or decrease the amount of processing equipment required to meet service standards? Please identify, describe, and provide all documents detailing how the Load Leveling Plan could impact the amount of processing equipment needed by the Postal Service.

b. Will the Load Leveling Plan increase or decrease the physical capacity of the network (e.g., facility square footage)? Please identify, describe, and provide all documents detailing how the Load Leveling Plan could impact the amount of facility square footage needed by the Postal Service.

### **RESPONSE**

a. The Postal Service expects that the Load Leveling Plan will have minimal, if any, effect on the amount of processing equipment required to meet service standards. However, this impact has not been studied fully, and there could be some efficiency gains through better machine utilization.

b. The Postal Service expects that although the Load Leveling Plan could increase the use of existing facility square footage at some plants, it will not require the Postal Service to acquire additional capacity. Please see the response to PR/USPS-T1-18(e) and (f).

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**PR/USPS-T1-23**

In Docket Nos. N2006-1 and N2012-1, the Postal Service leveraged the IBM LogicNet software for network modeling.

- a. Did the Postal Service use IBM LogicNet or any other network modeling software to better understand the potential impacts of the Load Leveling Plan?
- b. Please identify, describe, and provide all analysis of the Load Leveling Plan using IBM LogicNet or any other network modeling software.
- c. Please identify, describe, and provide all network planning analysis that utilized IBM LogicNet or any other network modeling software and incorporated the Load Leveling Plan.

**RESPONSE**

- a. No.
- b. Not applicable.
- c. Not applicable.

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### **PR/USPS-T1-24**

USPS-LR-N2014-1/6, file "1-10-14" are slides from a January 10, 2014 presentation given on the Load Leveling Plan. Slide 25 lists "Frequently Asked Questions/Concerns" including "early delivery" of mail entered on Thu/Fri/Sat and "5 Day Delivery implications."

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b. Please describe the impact 5 Day Delivery would have on the load levels throughout the week after the nationwide implementation of the Load Leveling Plan. In your response, please address both DSCF Standard Mail volume specifically, as well as the overall mail volume.

c. Please identify, describe, and provide all documents detailing the impact of implementation of both 5 Day Delivery and the Load Leveling Plan.

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f. How does the Load Leveling Plan impact the potential savings of 5 Day Delivery?

g. How does the Load Leveling Plan impact the ability of the Postal Service to realize its full estimated savings of 5 Day Delivery?

### **RESPONSE**

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b. I am not aware of any study of the impact of five-day delivery on Load Leveling. However, assuming that mailers would drop ship mail in a five-day environment on the same days as in the present environment, the implementation of load leveling would lessen the impact to delivery operations in making the transition to a situation where Standard Mail is delivered five-days per week to street addresses.

c. Please see USPS Library Reference USPS-LR-N2014-1/6, 6-12-13.pdf.

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f. I am not aware of any study of the impact of five-day delivery on load leveling.

g. I am not aware of any study of the impact of five-day delivery on load leveling.

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### **PR/USPS-T1-27**

The Postal Service plans to implement the Load Leveling Plan no earlier than March 27, 2014.

- a. Please explain the Postal Service's planned implementation timetable. If no timetable is available, please explain when the Postal Service plans to establish a firm implementation timetable for the Load Leveling Plan.
- b. Please describe how the Postal Service plans to implement the Load Leveling Plan (e.g., nationwide on the same day or facility-by-facility). If no plans are available, please explain when the Postal Service plans to establish a Load Leveling implementation plan.
- c. Please explain how far in advance of implementation of the Load Leveling Plan does the Postal Service plan to provide notice to affected mailers.

### **RESPONSE**

a-b. The Postal Service plans to establish an implementation timetable for the Load Leveling Plan after it has an opportunity to review and consider the comments it receives in response to the *Federal Register* notice that announced the proposal being considered in this docket.

c. A *Federal Register* notice announcing the final rule will be published at least 30 days in advance of implementation.